

EXHIBIT 2

Zhao, Yanan

From: Werner, Tom
Sent: Monday, August 21, 2023 1:09 PM
To: James Y. Kim
Cc: AGORA LAW; AGORA Law Group, PLLC; Kalai L. Wineland; #Netlist-Samsung-D.Del
Subject: RE: Samsung's Subpoena to SK hynic Inc.

James,

We understand that the those documents reflect information subject to one of more agreements of confidentiality. Any disclosure of those documents would violate one or more of those agreements. Netlist objects. Please confirm that no production will be made.

Very truly yours,

Thomas C. Werner, Esq.
Discovery Counsel
Irell & Manella LLP
1800 Avenue of the Stars
Suite 900
Los Angeles, CA 90067-4276
TWerner@irell.com
(310) 203-7956 (direct)
(he/him/his)

From: James Y. Kim <jyk@agoralaws.com>
Sent: Monday, August 21, 2023 12:47 PM
To: Werner, Tom <TWerner@irell.com>
Cc: AGORA LAW <ip@agoralaws.com>; AGORA Law Group, PLLC <email@agoralaws.com>; Kalai L. Wineland <klw@agoralaws.com>; #Netlist-Samsung-D.Del <Netlist-Samsung-D.Del@irell.com>
Subject: RE: Samsung's Subpoena to SK hynic Inc.

Tom,

Since we haven't received an objection from Netlist, we understand that Netlist does not object to SK Hynix, Inc. producing documents in response to the Samsung's subpoena. Thus, SK hynix, Inc. will produce the documents relating to the settlement negotiations under the "Confidential-AEO Only" tomorrow.

Best, James

AGORA Law Group, PLLC
3400 188th Street SW, Suite 695
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From: Werner, Tom <TWerner@irell.com>
Sent: Tuesday, August 15, 2023 7:27 AM
To: James Y. Kim <zyk@agoralaws.com>
Cc: AGORA LAW <ip@agoralaws.com>; AGORA Law Group, PLLC <email@agoralaws.com>; Kalai L. Wineland <klw@agoralaws.com>; #Netlist-Samsung-D.Del <Netlist-Samsung-D.Del@irell.com>
Subject: RE: Samsung's Subpoena to SK hynic Inc.

James,

We expect that SK hynix will respect any protective orders governing any responsive information that SK hynix identifies, although we understood that SK hynix no longer possesses any materials from the prior actions involving Netlist's patents.

Very truly yours,

Thomas C. Werner, Esq.
Discovery Counsel
Irell & Manella LLP
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TWerner@irell.com
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From: James Y. Kim <jyk@agoralaws.com>
Sent: Monday, August 14, 2023 1:49 PM
To: Werner, Tom <TWerner@irell.com>
Cc: AGORA LAW <ip@agoralaws.com>; AGORA Law Group, PLLC <email@agoralaws.com>; Kalai L. Wineland <klw@agoralaws.com>; #Netlist-Samsung-D.Del <Netlist-Samsung-D.Del@irell.com>
Subject: RE: Samsung's Subpoena to SK hynic Inc.

Tom,

SK hynix is going to respond to Samsung's subpoena by the end of this week. Please note that SK hynix's notice to Netlist had already been delivered on Aug. 1, 2023 (see attached) and we haven't heard back from Netlist yet. Please note that if we do not hear from Netlist by August 16, 2023, SK hynix will respond to the Samsung's subpoena in due course.

Best regards, James

From: James Y. Kim
Sent: Thursday, August 3, 2023 10:53 AM
To: Werner, Tom <TWerner@irell.com>
Cc: AGORA LAW <ip@agoralaws.com>; AGORA Law Group, PLLC <email@agoralaws.com>; Kalai L. Wineland <klw@agoralaws.com>
Subject: Samsung's Subpoena to SK hynic Inc.

Tom,
As you know, SK hynix received Samsung's notice of subpoena as attached. Please be advised that the response to subpoena has been extended by the end of next week and thus, there will be no deposition tomorrow.
Best, James

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